1 2	RENE L. VALLADARES Federal Public Defender Nevada State Bar No. 11479		
3	BRENDA WEKSLER Assistant Federal Public Defender Nevada State Bar No. 8124 411 E. Bonneville, Ste. 250		
4			
5	Las Vegas, Nevada 89101 (702) 388-6577/Phone		
6	(702) 388-6261/Fax Brenda_Weksler@fd.org		
7	Attorney for Michael Friedman		
8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
9			
10			-,,
11	UNITED STATES OF AMERICA,		Case No. 2:16-cr-103-GMN-GWF
12	Plaintiff,		UNOPPOSED MOTION TO
13	v.		<u>CONTINUE SELF SURRENDER</u> <u>DATE</u>
14	MICHAEL FRIEDMAN,		
15	Defendant.		Expedited Treatment Requested
16			
17	COMES NOW defendant Michael Friedman, through his attorney, Assistant Federal		
18	Public Defender Brenda Weksler, hereby submits this Unopposed Motion to Continue Self		
19	Surrender Date.		
20	DATED this 26 th day of September, 2017.		
21		RI	ENE L. VALLADARES
22		Fe	deral Public Defender
23	E	3y: <u>/s/</u>	Brenda Weksler
24	BRENDA WEKSLER Assistant Federal Public Defender Attorney for Michael Friedman		
25			
26			

MEMORANDUM

On July 7, 2017, Michael Friedman was sentenced to serve a term of 10 months in prison (5 months in custody and 5 months of home confinement). He was ordered to self-surrender on October 6, 2017. Mr. Friedman has contacted undersigned requesting an extension of 3 months for his self-surrender. The reason underlying his request is his girlfriend's medical condition. *See* Exhibit A (Mr. Friedman's letter) and Exhibit B (medical records attached under seal). Undersigned has contacted the government regarding this request. They do not oppose the request so long as the Court is inclined to grant it.

DATED this 26th day of September, 2017

Respectfully submitted, RENE L. VALLADARES Federal Public Defender

By: /s/Brenda Weksler

BRENDA WEKSLER Assistant Federal Public Defender Attorney for Michael Friedman

IT IS SO ORDERED.

DATED this $\frac{27}{2}$ day of September, 2017.

Gloria M. Navarro, Chief Judge

United States District Court

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on September 26, 2017, she served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO CONTINUE SELF SURRENDER DATE** (Expedited Treatment Requested) by electronic service (ECF) to the person named below:

STEVEN W. MYHRE Acting United States Attorney DANIEL SCHIESS Assistant United States Attorney 501 Las Vegas Blvd. South Suite 1100 Las Vegas, NV 89101

/s/ Lauren Conklin
Employee of the Federal Public Defender

EXHIBIT "A"

EXHIBIT "A"

Honorable Judge Gloria M. Navarro
United States District Court

333 S. Las Vegas Blvd., 7th Floor
Las Vegas, Nevada 89101

Re: Case # 2:16-cr-00103-GMN-GWF

Michael Stephen Friedman

Your Honor:

I am to self-surrender by 10/6/2017 and am prepared to do so, but the attached medical reports are showing some serious issues for my girlfriend, who is disabled and appeared in court when I was sentenced. A month ago she started having female bleeding and had tests done and the attached documents are the results, which are serious. We only received these reports last Friday, 10/22/17. She has an appointment with a Gynecologic Oncologist on 10/2/17, but they are trying to get her in sooner if possible. Her parents are deceased and she only has three half siblings, who do not speak to her and live in Idaho. We have tried her friends who live out of state and they have their own responsibilities and if surgery is necessary, as we have been told it will be, they can't just uproot their lives to come heer for more than a month. We are told it could also entail chemo and/or radiation therapy too.

I am asking for a three months extension to report without her seeing the surgeon yet because we don't know exactly lies ahead of her. This is about her life and not mine and I don't know what else to do. The documentation that we currently have is attached for you to review.

Thank you for your consideration.

Michael Friedman